

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff,

v.

BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD; ARNOLD
EILERT; MICHELLE GAJEWSKI; ROBERT
GAJEWSKI; RACHAEL GLENISTER; GREGORY
ISRAELSON; IRVIN LUCAS; and PHILIP
OSSOWSKI,

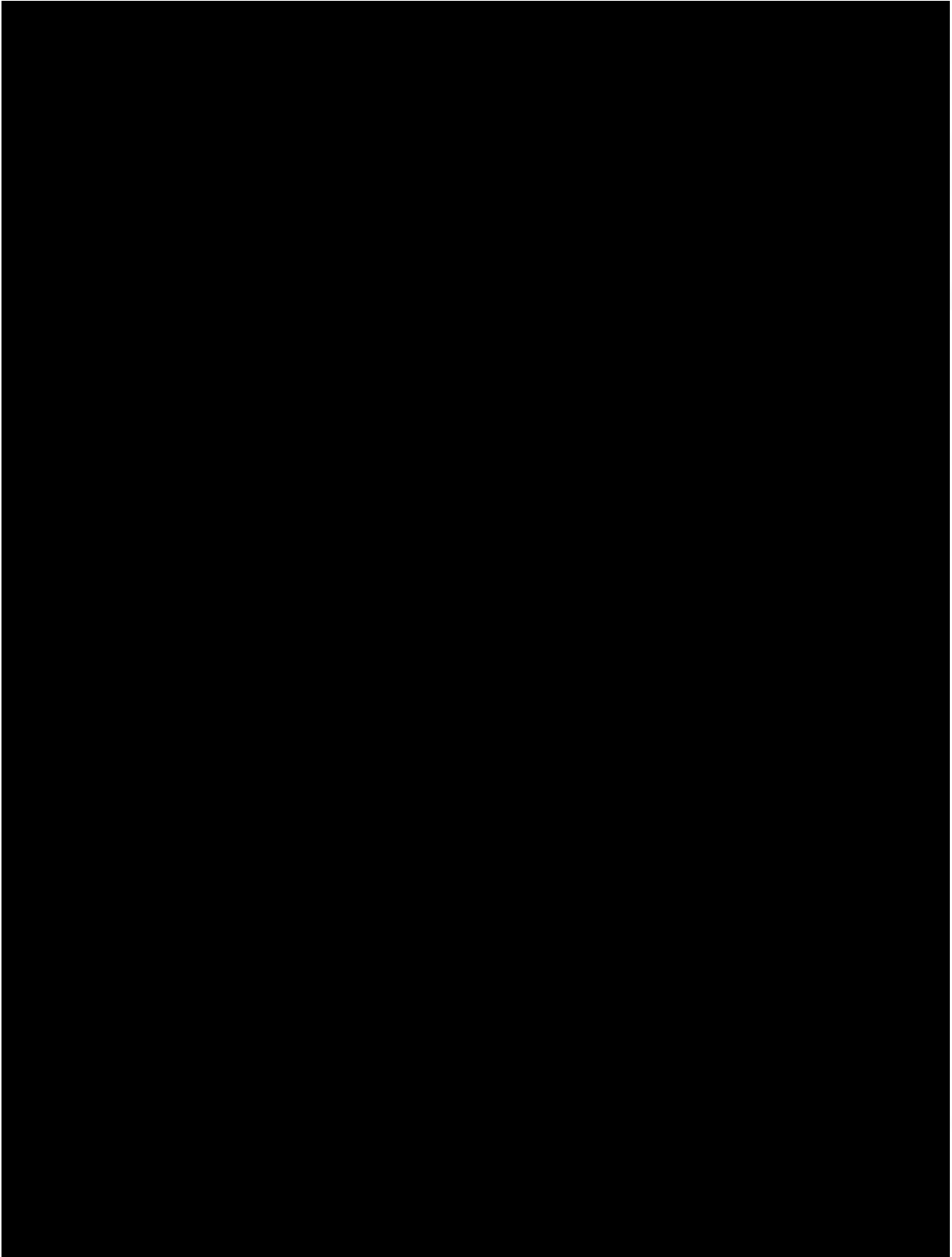
Defendants.

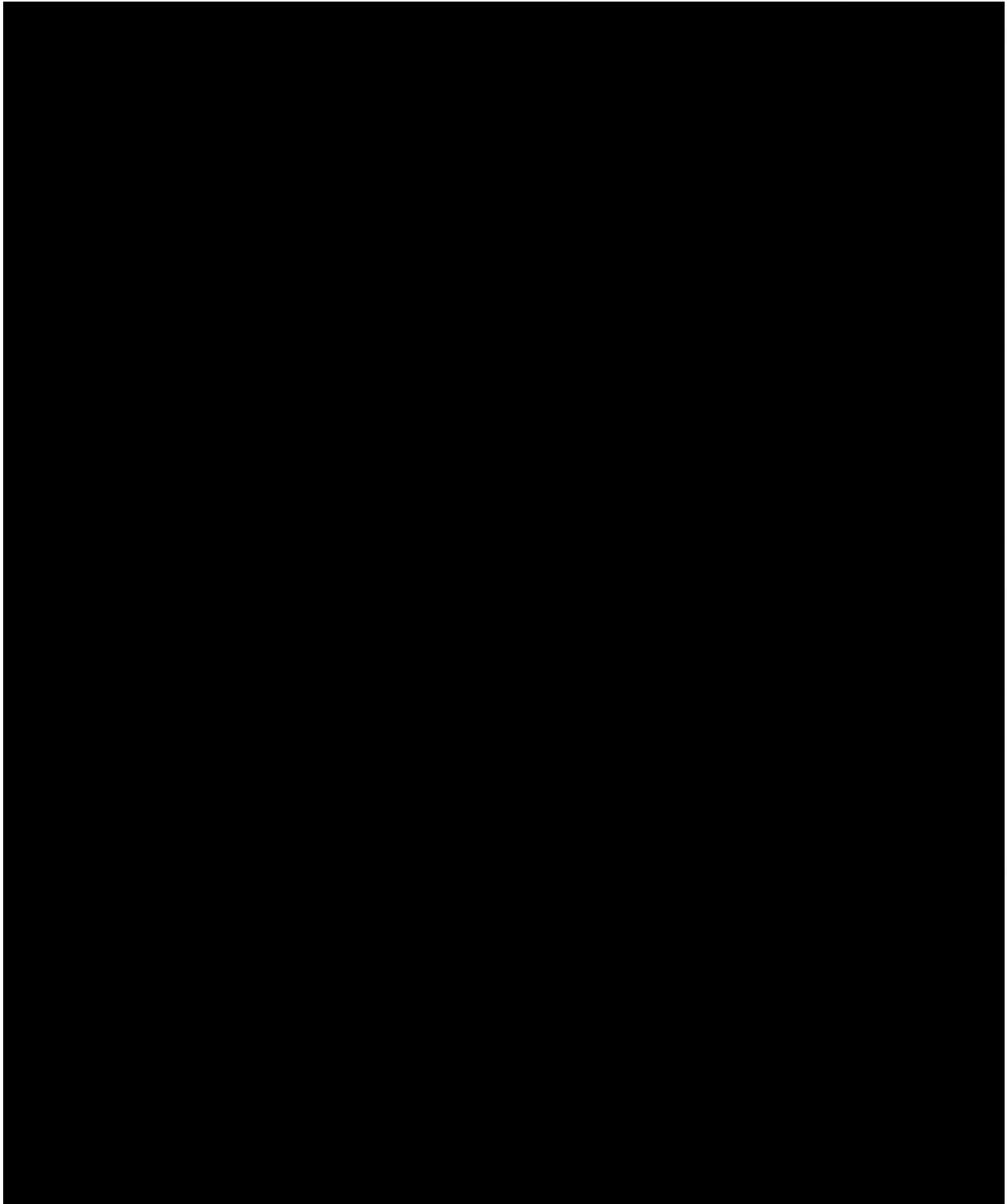
Civil Action No. 4:21-cv-10572-
TSH

**AFFIDAVIT OF IRVIN LUCAS SUPPORT OF
DEFENDANTS BLUE SUN SCIENTIFIC, LLC AND
THE INNOVATIVE TECHNOLOGIES GROUP & CO., LTD'S
OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

1. I, Irvin Lucas, certify that I have personal knowledge of the facts set forth herein. I am over the age of eighteen, I currently reside at 6835 Laurel Canyon Blvd, Apt 110, North Hollywood, CA 91605, and am fully competent to testify to the facts in this declaration.
2. I am President of Defendant Blue Sun Scientific, LLC ("Blue Sun"), a Maryland Limited Liability Company, whose address is 8017 Dorsey Run Rd., Jessup MD 20794.
3. Co-defendant ITGC is a small manufacturing company formed on 5 June 1997 to design and manufacture analytical instruments using near infrared (NIR) spectroscopy. Blue Sun was established in 2018 to sell and service NIR spectrometers manufactured by ITGC. Blue Sun sells ITGC's NIR instruments and parts at a markup and provides service and support for ITGC's and other competitors NIR instruments. Blue Sun's gross revenue over the last three years is as follows, broken down by sales of Phoenix Analyzers and support services:







* * * * *

I declare, under penalty of perjury of the United States of America that the foregoing is true and correct to the best of my present knowledge.

By: Irvin Lucas
Irvin Lucas

7/30/21
Date

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

On this 30th day of July 2021, before me Gabriela Celis, Notary Public personally came Irvin Lucas, known to me to be the individual described in and who executed the foregoing affidavit, and duly acknowledged to me that he executed the same and is the person described in the above affidavit; and that he signed his name hereto.

Gabriela Celis
Notary Public
[SEAL]

